BEFORE THE NORTH CAROLINA UTILITIES COMMISSION DOCKET NO. E-7, SUB 1170

In the Matter of:	
Petition of Duke Energy Carolinas, LLC for)	NCSEA'S PETITION TO
an Accounting Order to Defer Costs)	INTERVENE
Associated with Compliance with N.C. Gen.)	
Stat. 62-110.8 and for Approval of Extended)	
Initial CPRE EMF Rider Test Period)	

NCSEA'S PETITION TO INTERVENE

Pursuant to North Carolina Utilities Commission ("Commission") Rules R 1-5, R1-7, and R1-19, the North Carolina Sustainable Energy Association ("NCSEA") hereby petitions to intervene in the above-referenced docket. In support of this petition, NCSEA states as follows:

- 1. NCSEA is a non-profit corporation formed under the laws of North Carolina, with individual, business, and government members located across the State. NCSEA's mission is to promote a sustainable future through the use of renewable energy and energy efficiency programs. NCSEA seeks to achieve its objectives by advocating for public policies that encourage the responsible technological and market development of renewable energy and energy efficiency, including all aspects of demand side management, a smart grid, energy storage, and vehicle electrification.
- 2. NCSEA was actively involved in the negotiations that led to House Bill 589 and Session Law 2017-192, which adopted N.C. Gen. Stat. § 62-110.8. NCSEA was a party to Docket No. E-100, Sub 150 which established the rules governing the competitive procurement of renewable energy ("CPRE") program. NCSEA also party to Docket Nos. E-2, Sub 1159 and E-7, Sub 1156, which established CPRE plans for Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP").

- 3. Many of NCSEA's members are developers of renewable energy projects that have substantial interests in DEC and DEP's CPRE programs. As such, NCSEA has an interest in ensuring that N.C. Gen. Stat. § 62-110.8 is implemented in accordance with the intent of the legislature.
- 4. NCSEA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.
- 5. NCSEA's address is 4800 Six Forks Road, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

Peter H. Ledford General Counsel for NCSEA 4800 Six Forks Road Suite 300 Raleigh, NC 27609 (919) 832-7601 Ext. 107 peter@energync.org Benjamin W. Smith Regulatory Counsel for NCSEA 4800 Six Forks Road Suite 300 Raleigh, NC 27609 (919) 832-7601 Ext. 111 ben@energync.org

6. Pursuant to Commission Rule R1-39, NCSEA agrees to electronic service of all pleadings and other filings in this matter.

WHEREFORE, for the reasons set forth above, NCSEA prays that it be allowed to intervene in this matter.

Respectfully submitted, this the 5th day of April, 2018.

/s/ Peter H. Ledford
Peter H. Ledford
General Counsel for NCSEA
N.C. State Bar No. 42999
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VERIFICATION

Peter H. Ledford, first being duly sworn, deposes and says that he is the attorney for NCSEA; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of NCSEA.

This the 5th day of April, 2018.

Peter H. Ledford

NORTH CAROLINA WAKE COUNTY

Sworn to and subscribed before me,

this the 5th day of April, 2018.

Daniel G Brookshire, Notary Public Orange County, North Carolina My Commission Expires 7/2/2022

[AFFIX SEAL OF NOTARY]

Notary Public

Printed Name of Notary Public

My Commission Expires: 7-2-2022

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Comments by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 5th day of April, 2018.

/s/ Peter H. Ledford
Peter H. Ledford
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